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April 21, 2016

VIA ECF AND EMAIL

Honorable Stuart M. Bernstein
United States Bankruptcy Court
Southern District of New York
One Bowling Green
New York, New York 10004-1408

Re: *Irving H. Picard, Trustee v. Helene Saren-Lawrence*,
Adv. Pro. No. 10-04898 (SMB)

Dear Judge Bernstein:

On April 4, 2016, your Honor entered an order (the “Order”) compelling Valley National Bank to comply with the Subpoena served in the above-captioned case. (ECF No. 92). The Subpoena requires the production of the personal bank records of Helene Saren-Lawrence and those of her non-defendant husband, James Lawrence (“Movants”). The Order also provided a fourteen day stay of compliance with the Subpoena so that Movants could seek leave to appeal the Order in the District Court.

On April 15, 2016, Movants filed their motion for leave to appeal in the District Court. Movants and also sought a motion to stay pending determination of their motion for leave to appeal. To date, no judge has been assigned to the case. Therefore, there currently is no District Court Judge to consider Movants’ requested stay.

Accordingly, Movants respectfully request that your Honor grant an additional fourteen day stay of compliance with the Subpoena so that Movants may make their stay request in the District Court before the subpoenaed records are produced and thereby avoid the irreversible breach of Movants’ personal privacy interests. Movants have conferred with counsel for the Trustee, who opposes a stay request.

The Court’s attention to this matter is most appreciated.

Respectfully submitted,

/s/ Gregory M. Dexter

Gregory M. Dexter Esq.

GMD:leb

CHAITMAN LLP

Hon. Stuart M. Bernstein
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cc: All counsel of record by ECF & email
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